



August 11, 1993

Steven R. Ritchie, Executive Officer  
California Regional Water Quality Control Board  
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Dear Mr. Ritchie:

The Environmental Defense Fund strongly supports the adoption of the Proposed Amendment to the Water Quality Control Plan incorporating the Mass Emission Reduction Strategy for Selenium. As we noted in previous testimony<sup>1</sup> (incorporated here by reference), the proposed strategy:

- acknowledges the strong scientific and legal basis for dramatically decreasing selenium inputs to the estuary in order to protect beneficial uses;
- recognizes that a mass loading limit is at once the most ecologically relevant, administratively streamlined, and flexible (from the discharger perspective) method of accomplishing the necessary reductions; and
- proposes an emission reduction schedule consistent with the best scientific evidence available for estimating the necessary cutbacks.

While significant details remain to be resolved regarding the mechanics of implementation, these can be addressed concurrently with the first few years of program implementation. In sum, the proposed Amendment provides a reasonable and effective mechanism for addressing the adverse impacts of selenium loading on the estuary.

We look forward to working with Board staff to ensure the successful implementation of this strategy.

Sincerely,

  
Dr. Terry F. Young  
Senior Consulting Scientist

TFY/mw

<sup>1</sup> Comments of the Environmental Defense Fund on Mass Emissions Reduction Strategy for Selenium, November 18, 1992.

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